

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

RAFQA STAR, LLC,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

Civil Action No. 6:22-cv-01207-ADA

JURY TRIAL DEMANDED

**DECLARATION OF ADAM WOODWARD, ESQ.
IN SUPPORT OF RAFQA STAR, LLC'S OPPOSITION TO
GOOGLE LLC'S OPPOSED MOTION TO TRANSFER VENUE**

I, Adam Woodward, declare as follows:

1. I am an associate at Devlin Law Firm LLC and counsel of record for Plaintiff Rafqa Star, LLC (“Plaintiff”).
2. I make this declaration in support of Plaintiff’s Opposition to Google, LLC’s (“Google” or “Defendant”) Opposed Motion to Transfer in the above-captioned action, such that all Exhibits referenced herein are attached to this declaration and incorporation into Plaintiff’s Opposition to Defendant’s Motion to Transfer.
3. Where this declaration refers to exhibits comprised of printouts of websites, or articles available therefrom, the .pdf documents constituting said exhibits were generated using the “Save as PDF” destination associated with the print function of the Google Chrome browser. Where appropriate, the image scale was altered and/or background graphics eliminated to ensure relevant information is visible, using the settings in the Google Chrome browser print function. Some exhibits have been annotated with highlighting.
4. Exhibit numbers 1 through 4 were intentionally not used in this motion and are

excluded from the exhibits list.

5. Attached as Exhibit 5 is a true and correct copy of Alphabet, Inc.’s 2020 fourth quarter and 2020 fiscal year financial results

6. Attached as Exhibit 6 is a true and correct copy of a website printout of the Google website “Discover our data center locations,” as obtained from <https://www.google.com/about/datacenters/locations/midlothian>, on June 7, 2023.

7. Attached as Exhibit 7 is a true and correct copy of a website printout of Steve Brown, *Google's massive \$600M data center takes shape in Ellis County as tech giant ups Texas Presence*, The Dallas Morning News (June 30, 2015), as obtained from <https://www.dallasnews.com/business/real-estate/2019/06/14/google-s-massive-600m-data-center-takes-shape-in-ellis-county-as-tech-giant-ups-texas-presence/> on June 7, 2023.

8. Attached as Exhibit 8 is a true and correct copy of a website printout of Kara Carlson, *Google's 'future is really bright' in Austin, company executive says*, Austin American-Statesman, Aug. 13, 2021, as obtained from <https://www.statesman.com/story/business/2021/08/13/austin-google-exec-companys-future-really-bright-in-city-tx/5488231001/>, on June 7, 2023.

9. Attached as Exhibit 9 is a true and correct copy of a website printout of Shonda Novak, *Google says it plans 'significant' Austin expansion*, Austin American-Statesman, June 14, 2019, as obtained from <https://www.statesman.com/story/news/local/flash-briefing/2019/06/14/google-says-it-plans-significant-expansion-in-austin/4900532007/> on June 7, 2023.

10. Attached as Exhibit 10 is a true and correct copy of the LinkedIn resume of Bryan Klinger, as obtained from www.linkedin.com/in/bryanklingner on June 7, 2023.

11. Attached as Exhibit 11 is a true and correct copy of the LinkedIn resume of Ningyuan Wang, as obtained from www.linkedin.com/in/wny1990 on June 7, 2023.
12. Attached as Exhibit 12 is a true and correct copy of the LinkedIn resume of Bilawal Sidhu, as obtained from www.linkedin.com/in/bilawalsidhu on June 7, 2023.
13. Attached as Exhibit 13 is a true and correct copy of the LinkedIn resume of Nick DeMeuse, as obtained from www.linkedin.com/in/nick-demeuse-83a38613 on June 7, 2023.
14. Attached as Exhibit 14 is a true and correct copy of the LinkedIn resume of Stephanie L'Ecuyer, as obtained from www.linkedin.com/in/stephanie-lecuyer on June 7, 2023.
15. Attached as Exhibit 15 is a true and correct copy of the LinkedIn resume of Feng Zheng, as obtained from www.linkedin.com/in/feng-zheng-us on June 7, 2023.
16. Attached as Exhibit 16 is a true and correct copy of the LinkedIn resume of Alan Lopez, as obtained from www.linkedin.com/in/alan-lopez on June 7, 2023.
17. Attached as Exhibit 17 is a true and correct copy of Plaintiff Rafqa Star, LLC's First Set of Interrogatories On the Matter of Venue to Defendant Google, LLC served by Rafqa on Defendant Google on May 5, 2023.
18. Attached as Exhibit 18 is a true and correct copy of Defendant Google LLC's Responses and Objections to Plaintiff Rafqa Star, LLC's First Set of Interrogatories on the Matter of Venue as served on Rafqa Star, LLC on May 26, 2023.
19. Attached as Exhibit 19 is a true and correct copy of Defendant Google LLC's Responses and Objections to Plaintiff's First Set of Requests for Production on the Matter of Venue as served on Rafqa Star, LLC on May 26, 2023.
20. Attached as Exhibit 20 is a true and correct copy of a website printout entitled "Now Anyone Can Share Their World With Street View" from December 3, 2020, as obtained

from <https://blog.google/products/maps/anyone-can-share-their-world-with-street-view/> on June 7, 2023.

21. Attached as Exhibit 21 is a true and correct copy of U.S. Patent Application No. 2007/0162942 filed on behalf of Hamynen, et. al. on Jan 9, 2006.

22. Attached as Exhibit 22 is a true and correct copy of the LinkedIn resume of Mikko Kankainen, as obtained from <https://www.linkedin.com/in/mikko-kankainen/> on June 7, 2023.

23. Attached as Exhibit 23 is a true and correct copy of the LinkedIn resume of Jaron Waldman, as obtained from <https://www.linkedin.com/in/jaronwaldman/> on June 7, 2023.

24. Attached as Exhibit 24 is a true and correct copy of the LinkedIn resume of Kimmo Hamynen, as obtained from <https://www.linkedin.com/in/hamynenkimmo/> on June 7, 2023.

25. Attached as Exhibit 25 is a true and correct copy of the LinkedIn resume of Ping-Wen Ong, as obtained from <https://www.linkedin.com/in/ping-wen-ong-0618981/> on June 7, 2023.

26. Attached as Exhibit 26 is a true and correct copy of the LinkedIn resume of Syamantak Kumar, as obtained from <https://www.linkedin.com/in/syamantak-kumar/> on June 7, 2023.

27. Attached as Exhibit 27 is a true and correct copy of U.S. Patent No. 9,582,166 to Vaittinen et. al, filed May 16, 2020 and issued on February 28, 2017.

28. Attached as Exhibit 28 is a true and correct copy of the LinkedIn resume of Erick Tseng, as obtained from <https://www.linkedin.com/in/erick-tseng-b87216/> on June 7, 2023.

29. Attached as Exhibit 29 is a true and correct copy of a patent assignment from

Maran Ma et. al. to 2238366 Ontario Inc. executed on April 14, 2014.

30. Attached as Exhibit 30 is a true and correct copy of Defendant Google's Preliminary Invalidity Contentions served on Plaintiff Rafqa Star on April 10, 2023.

31. Attached as Exhibit 31 is a true and correct copy of a table summarizing the location of 26 third-party invalidity witnesses who are either inventors or authors associated with prior art identified by Google in its Preliminary Invalidity Contentions served on Rafqa Star on April 10, 2023. Included with the table is over 130 pages of evidence supporting the location of each of the 26 witnesses.

32. Attached as Exhibit 32 is a true and correct copy of dictionary entries for the term "report to" as taken from The Macmillan Dictionary, The Longman Dictionary, and The Merriam-Webster Dictionary.

33. Attached as Exhibit 33 is a true and correct copy of a website printout of Nadja Brandt, San Francisco Hotels Are World's Priciest as Rates Surge 88%, Bloomberg.com (June 30, 2015), as obtained from <https://www.bloomberg.com/news/articles/2015-06-30/san-francisco-hotels-are-world-s-priciest-as-rates-surge> on May 10, 2022.

34. Attached as Exhibit 34 is a true and correct copy of a website printout from hotels.com showing all 3-star, 4-star, and 5-star hotels (as rated by hotels.com) in Waco, Texas with availability and published average daily and total rates for a one-week stay in one room for one adult traveler from June 1, 2022 to June 8, 2022, as seen on May 7, 2022.

35. Attached as Exhibit 35 is a true and correct copy of a website printout from hotels.com showing all 3-star, 4-star, and 5-star hotels (as rated by hotels.com) in San Francisco, CA, having a guest rating of 9.0 or higher, with availability and published average daily and total rates for a one-week stay in one room for one adult traveler from June 1, 2022 to June 8, 2022, as

seen on May 7, 2022.

36. Attached as Exhibit 36 is a true and correct copy of a website printout from the U.S. General Services Administration website displaying FY 2022 Per Diem Rates for California, as obtained from the GSA website on May 9, 2022.

37. Attached as Exhibit 37 is a true and correct copy of a website printout from the U.S. General Services Administration website displaying FY 2022 Per Diem Rates for Texas, as obtained from the GSA website on May 9, 2022.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed in Fort Myers, FL on June 7, 2023.

Respectfully submitted,

/s/ Adam Woodward
Adam Woodward